

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DAVID DREYER, and KATHERINE STEWART, individually and on behalf of other employees similarly situated	§	
	§	
	§	
Plaintiffs	§	
v.	§	CIVIL ACTION NO. 4:08-cv-01212
	§	
	§	
BAKER HUGHES OILFIELD OPERATIONS, INC., d/b/a BAKER HUGHES BUSINESS SUPPORT SERVICES	§	
	§	JURY TRIAL DEMANDED
	§	
	§	
Defendant	§	

NOTICE OF RIGHTS REGARDING OVERTIME PAY

TO: All current and former U.S. based employees of Baker Hughes Oilfield Operations, Inc., d/b/a Baker Hughes Business Support Services (“Baker Hughes”), who held non-managerial positions in the Network Services Group on the Enterprise Server Team at any time between April 18, 2005 and the present and who were not paid for hours worked in excess of forty (40) in any given workweek at one-and-a-half (1.5) times their regular rate.

RE: Fair Labor Standards Act (“FLSA”) lawsuit against Baker Hughes.

1. PURPOSE OF THIS NOTICE

You are getting this notice because you were employed by Baker Hughes. A lawsuit was brought against Baker Hughes by two of Baker Hughes’ former technical support employees. The lawsuit claims that the company incorrectly classified you as exempt and failed to pay you for overtime at one-and-a-half (1.5) times your regular rate as required by federal law.

This notice is for the sole purpose of determining the identity of those persons who wish to be involved in this lawsuit. Although the Court has authorized the sending of this Notice, there is no assurance at this time that the Court will grant any back wages or other relief through this lawsuit.

2. HOW TO PARTICIPATE

If you decide to join this lawsuit, and thus participate in any recovery that may result from this lawsuit, it is extremely important that you read, sign and return the enclosed “Notice of Consent” form to the Plaintiffs’ attorney, Trang Q. Tran, of the Tran Law Firm, L.L.P., 3050 Post

Oak Blvd, Suite 1720, Houston, Texas 77056, **within forty-five (45) days of receiving this notice.** An addressed, stamped envelope is enclosed for your convenience.

You are permitted to file a Notice of Consent form even if you have received payments from Baker Hughes designated as "back overtime," or signed a release related to such payments. The Court has not determined whether such a payment or release would be sufficient or binding.

If you do not file a Notice of Consent form and join in this case, you will not receive any back wages for overtime or other relief through this lawsuit even if Plaintiffs settle or win the case. **You must file a Notice of Consent to join this action if you wish to recover unpaid overtime wages from this lawsuit.**

If you have questions about this suit or your rights or wish for Plaintiffs' attorney, Trang Q. Tran, to represent you, you may contact him at (713) 223-8855.

3. EFFECT OF JOINING THIS SUIT

By joining this lawsuit, you are consenting to have U.S. Magistrate Judge Stephen Wm. Smith conduct all proceedings in the case, including trial and final judgment. If you join the lawsuit, you will be bound by the judgment of the Court on all issues of the case, whether it is favorable or unfavorable to you.

4. BAKER HUGHES CANNOT RETALIATE AGAINST YOU

BAKER HUGHES is prohibited from taking any action against you in retaliation for joining this lawsuit.

5. UNDOCUMENTED WORKERS HAVE RIGHTS UNDER THE LABOR LAW

The FLSA covers employees who are citizens of other countries even if such employees do not have valid social security numbers or are undocumented. Undocumented workers are entitled to recover any unpaid overtime pay under the law.

THIS NOTICE HAS BEEN AUTHORIZED BY THE FEDERAL DISTRICT COURT, U.S. MAGISTRATE JUDGE STEPHEN WM. SMITH. THE COURT HAS TAKEN NO POSITION IN THIS CASE REGARDING THE MERITS OF THE PLAINTIFFS' CLAIMS OR DEFENDANT'S DEFENSES.

Yours truly,

TRAN LAW FIRM, L.L.P.

By: _____

Trang Q. Tran
State Bar Number: 00795787
Andrew H. Iwata
State Bar Number: 24048568
TRAN LAW FIRM L.L.P.
3050 Post Oak Blvd, Suite 1720
Houston, Texas 77056
Telephone: (713) 223-8855
Facsimile: (713) 623-6399

ATTORNEYS FOR PLAINTIFFS